

UNITED STATES DISTRICT COURT

for the

Western District of Texas

FILED

July 21, 2022

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America

v.

Mike Angelo JIMENEZ

BY: _____

CL

DEPUTY

Case No.

DR:22-M-1696_____
*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 07/19/2022 in the county of Uvalde in the
Western District of Texas, the defendant(s) violated:*Code Section*

8 USC 1324 (a)(1)(A)(v)(I) & (B)(iii)

Offense Description

Conspiracy to Transport Illegal Aliens: Did knowingly and intentionally combine, conspire, confederate and agree with others known and unknown, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered and remained in the United States in violation of law, and such offense placed in jeopardy the life of one or more persons, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) and (B)(iii)

This criminal complaint is based on these facts:

See Attachment A

Continued on the attached sheet.

Samuel Green

Complainant's signature

Samuel Green, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/21/2022*Victor R. Garcia*

Judge's signature

City and state: Del Rio, Texas

Honorable Victor Garcia U.S. Magistrate

Printed name and title
Judge

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Attachment A

Your affiant, Samuel Green, is a Special Agent with Homeland Security Investigations (HSI). As a Special Agent, I am authorized by law or by a government agency to engage in or supervise the prevention, detection, investigation, or prosecution of violations of Federal criminal laws. Currently, I am tasked with investigating criminal activity within the Western District of Texas (TX).

On Tuesday, July 19, 2022, at 10:45 PM, HSI Special Agent (SA) Samuel Green responded to an incident involving a gray Dodge Ram pickup truck bearing Texas license plate (TXLP) PDT6290 near the entrance of the Laughlin Air Force Base located in Val Verde County in the Western District of Texas. SA Green was advised that personnel from the United States Border Patrol (USBP) observed this vehicle pick up several illegal aliens along Highway 277 near Del Rio, Texas. USBP agents attempted to stop the vehicle and conduct immigration inspections by activating the emergency equipment on their marked USBP vehicles. The driver of the vehicle ignored the emergency equipment and fled. The driver of the vehicle subsequently lost control of the vehicle near the entrance of Laughlin Air Force Base and struck a ditch. This impact rendered the vehicle inoperable, and several subjects fled the scene. USBP agents were able to detain two subjects unlawfully present in the United States.

At 2:21 AM, SA Green was advised that the USBP located and detained several more subjects in the brush near the site of the crash. SA Green was advised that one of these subjects was a United States citizen from New York. SA Green responded to the Brackettville, Texas USBP station at 9:41 AM. Upon arrival SA Green was advised that the United States citizen apprehended near the scene of the crash was Mike Angelo JIMENEZ (DOB:08/30/1997). SA Green was advised that JIMENEZ was in possession of two cellular phones at the time he was apprehended. SA Green spoke with JIMENEZ and asked him if was in possession of any property. JIMENEZ stated he had United States currency in excess of \$200 United States Dollars (USD) and two cellular phones. JIMENEZ identified one of the cellular phones as a black Apple iPhone with cracks on the glass. JIMENEZ identified the other cellular phone as a black Apple iPhone in a red case. Upon locating JIMENEZ' personal property and retrieving the items described by JIMENEZ, HSI SA Green picked up the Apple iPhone in the red case and observed that it still had a map application running. HSI SA Green observed that the map had a highlighted route which would have guided JIMENEZ along Highway 277 to a stop sign. The highlight route then advised to take a left at the stop sign onto Highway 90. Those involved in human smuggling typically use these types of applications to take predetermined smuggling routes.

Human smuggling facilitators most often employ United States citizens to travel to the United States/Mexico border to pick up illegal aliens and transport them further into the United States. United States citizens are preferred to the fact they are already present in the United States, have driver's licenses, vehicles, cellular phones, and are able to maneuver near the 4 border without the fear of encountering immigration authorities. Typically, once illegal aliens have been picked up by smugglers, their phones are confiscated. Furthermore, those unlawfully present in the United States will typically avoid returning to the United States/Mexico border due to the abundance of immigration authorities present. Therefore, JIMENEZ still being in possession of

his cellular phones and being the only United States citizen present in the group of illegal aliens strongly suggests he was the unidentified load driver.

An open-source records check revealed no nexus between JIMENEZ and the southwest Texas border. Furthermore, JIMENEZ' United States citizenship, proximity to the crash site in conjunction with the proximity of several illegal aliens near the crash site strongly suggests that JIMENEZ was involved in this illegal alien smuggling attempt.

HSI SA Green obtained search warrants for JIMENEZ' cellular phones. Upon execution of one of the warrants, SA Green observed a message thread between JIMENEZ, and an unknown subject saved as "~Jigg" in the WhatsApp encrypted messaging application on JIMENEZ' cellular phone. This message thread contained communications consistent with human smuggling activity. Specifically, this message thread suggests that JIMENEZ was aware of the fact that he would be transporting illegal aliens. This message thread contained a set of detailed instructions on how to avoid law enforcement. JIMENEZ also received several GPS pin drops from his subject. These GPS pin drops include a location for the pickup of the illegal aliens JIMENEZ attempted to transport. JIMENEZ also shared his live location with this subject, a common tactic used to guide load drivers to specific locations.

Furthermore, at the scene of the crash on the night of July 19, 2022, HSI SA Green was advised there was a box of food from Panda Express located in the center console of the load vehicle. SA Green looked into the vehicle at the scene and observed this box of food. Upon arriving at the Brackettville, Texas USBP station on July 20, 2022, SA Green discovered a Panda Express receipt in JIMENEZ' personal property. This receipt was dated July 19, 2022, at 8:47:33 PM. The location of the Panda Express box in the center console of the load vehicle coupled with JIMENEZ' possession of the receipt even further confirms he was the unidentified load driver.

Your affiant submits there is probable cause to believe that Mike Angelo JIMENEZ violated Title 8 United States Code § 1324 (a)(1)(A)(v)(I) & (B)(iii) , which makes it a crime to knowingly and intentionally combine, conspire, confederate and agree with others known and unknown, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing or in reckless disregard of the fact said aliens came to, entered, and remained in the United States in violation of law and in furtherance of such violation of law, and such offense placed in jeopardy the life of one or more persons.